March 18, 2010 EB Docket NO. 06-36

Ms. Marlene H. Dortch Secretary Federal Communication Commission 445 12th Street SW Suite TW-A325 Washington, DC 20554

Reference: Certification of CPNI Filing of Montana Sky Networks, Inc.

Dear Ms. Dortch:

Enclosed is the CPNI compliance certificate of Montana Sky Networks, Inc. FRN 0017769704 in response to the Public Notice Issued by the Federal Communication Commission's Enforcement Bureau on January 30, 2006 and FCC 07-22 released on April 2, 2007.

Please contact me with any questions or concerns.

Sincerely,

Joseph Sullivan President of Operations 406-752-4335 x2000 joe@mooseweb.com

EB.06-TC-060, EB Docket **No. 06-36** Montana Sky Networks, Inc. FRN 0017769704

MONTANA SKY NETWORKS, INC. CERTIFICATION OF COMPLIANCE FOR THE 2009 CALENDAR YEAR

- 1. Montana Sky Networks, Inc. ("Montana Sky"), FRN 0017769704, is submitting this compliance certificate in response to the Public Notice issued by the FCC's Enforcement Bureau on January 30, 2006 (DA 06-223), and Report and Order FCC 07-22, pursuant to section 64.2009(e) of the Federal Communication Commission's rules.
- 2. I am the President of Operations for Montana Sky. I make this certification from my personal knowledge of the CPNI procedures and policies of Montana Sky.
- 3. Montana Sky expects to use CPNI for marketing purposes and has noticed customers under the "opt-out" provisions of the rules. Montana Sky's use of CPNI is and will be done in strict compliance with the principles and requirements outlined in Subtitle U of the Commission's rules. Accordingly, Montana Sky's personnel are trained in the proper use of CPNI for such purposes. Because CPNI will be used for marketing purposes, Montana Sky has established the appropriate safeguards for this type of use of CPNI data. These safeguards include documentation of this policy in company procedures and training of company personnel with regard to use of CPNI data.
- 4. On behalf of Montana Sky, I certify that, pursuant to the Commission's rules, Montana Sky has established procedures that are adequate to ensure compliance with CPNI rules currently in effect and the statements contained in this filing are correct.

Joseph Sullivan

President of Operations

EB.06-TC-060, EB Docket No. 06-36 Montana Sky Networks, Inc. FRN 0017769704

MONTANA SKY NETWORKS, INC. CERTIFICATION OF COMPLIANCE FOR THE 2009 CALENDAR YEAR

OPERATING PROCEDURES STATEMENT

- 1. Customer account prominently displays "CPNI" so that Customer Sales and Service Representatives (CSSRs) can readily identify customers opting to restrict use of their CPNI. When calls are received by CSSRs from customers with this preferred treatment they ask for customer permission to access account information.
- 2. Customers are given an opportunity to "opt-out" of CPNI usage beginning with the install of service. Additionally, customers may "opt-out" at any time.
- Notice regarding customer CPNI rights and Montana Sky's duty to protect CPNI is
 provided to all new and existing customers via the web site www.montanasky.net. In
 addition, the notice is also printed each month as a message on the customer's billing
 statement.
- Employees are trained on the proper use and/or disclosure of CPNI. Additionally
 procedures are documented and readily available to all employees on the company's
 internal website.
- Access to CPNI data is limited to employees and/or entities with proper authorization as allowed under Commission rules. All employees and/or entities with such access operate under policies and/or contract requiring nondisclosure of confidential information.
- 6. All marketing campaigns and materials are reviewed by a supervisory panel. This will include any use of CPNI data used in any given marketing effort. Please note that as of this time Montana Sky has not used CPNI data in this manner but the proper safeguards are in place should it be used.

- Improper use or disclosure of CPNI is subject to Montana Sky's work rules and disciplinary policies as outlined in its policy manual. The policy manual is readily accessible by all employees.
- Valid Photo Identification is required when customers come into the Montana Sky office requesting assistance/access to any account information.
- Call detail is only provided in a customer initiated call where the customer identifies the
 call record consistent with the FCC 07-22. Absent that information call detail will not be
 released during a customer initiated call. Montana Sky employees have been instructed
 to mail the detail to the address of record.
- Montana Sky does not currently, and has no plans to provide CPNI to a third party for the purposes of marketing.
- Customer initiated changes in passwords or addresses result in a generic notification to the customer using the address of record consistent with FCC rules.

EB.06-TC-060, EB Docket No. 06-36 Montana Sky Networks, Inc. FRN 0017769704

MONTANA SKY NETWORKS, INC. CERTIFICATION OF COMPLIANCE FOR THE 2009 CALENDAR YEAR

CUSTOMER COMPLAINTS

1. No record of any "complaints" of breaches received in 2009.

EB.06-TC-060, EB Docket No. 06-36 Montana Sky Networks, Inc. FRN 0017769704

MONTANA SKY NETWORKS, INC. CERTIFICATION OF COMPLIANCE FOR THE 2009 CALENDAR YEAR

PRETEXTING ACTIVITES

1. During the 2007 calendar year no pretexting activities were noted, so no actions were undertaken to address such activities.